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July 15, 2005

BY ELECTRONIC DELIVERY

Edward D. Ryan  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Letter dated June 15, 2005, regarding April Monthly Report (3/1/04-3/31/04)

Dear Mr. Ryan:

On behalf my client, the Republican Party of Louisiana ("the Party"), I am writing in response to the Commission's letter dated June 15, 2005, regarding the Party's April Monthly Report (3/1/04-3/31/04).

Pursuant to the Federal Election Campaign Act, as amended, State party committees must use federal funding for federal election activities, which include the payment of salaries and wages to employees who spend more than 25-percent of their compensated time in a given month in connection with a federal election. See 2 U.S.C. 431(20)(A); 11 C.F.R. 100.24(b)(4), 106.7(e)(2), 300.33(c)(2). A State party committee must pay employees who spend less than 25-percent of their time on federal campaign activities with funds that comply with state law. See 11 C.F.R. 106.7(c)(1), 300.33(c)(2); see also Advisory Opinion 2004-12 (June 14, 2004), Advisory Opinion 2003-11 (Aug. 7, 2003).

According to the Commission's "Instructions for F.E.C. Form 3X and Related Schedules," State party committees should report disbursements for "federal election activities" made entirely with federal funds on Line 30(b). See F.E.C. Instructions for Form 3X (Dec. 2004). Because salary payments to employees who spend less than 25-percent of their compensated time in a given month in connection with a federal election are not "federal election activities," State political parties are not required to disclose them on Line 30(b).

Between January 1, 2004, and March 31, 2004, the Party paid salaries to its employees for services in connection with the following activities:

" From January 1, 2004, through January 31, 2004, the Party spent federal funds to pay salaries for four employees and December payroll taxes for four employees. The employees did not work in connection with a federal election in December 2003 or January 2004. Funds raised in compliance with federal law also comply with the less stringent Louisiana state campaign finance law. Therefore, the Party properly disclosed disbursements for the employees' salaries and tax payments on Line 21(b) of the February Monthly Report.

" From February 1, 2004, through February 29, 2004, the Party spent federal funds to pay salaries for four employees and January payroll taxes for four employees. The employees did not work in connection with a federal election. Therefore, the Party properly disclosed disbursements for the employees' salaries and tax payments on Line 21(b) of the March Monthly Report.

" Finally, from March 1, 2004, through March 31, 2004, the Party spent federal funds to pay salaries for two employees. Each of the employees spent more than 25-percent of his or her compensated time working in connection with federal elections. Therefore, the Party has amended its April Monthly Report by listing the sum of the salary payments on Line 30(b). The Party also spent federal funds to pay a salary for a third employee and February payroll taxes for four

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employees. None of the employees worked in connection with a federal election. Therefore, the Party properly disclosed disbursements for the employee's salary and February tax payments on Line 21(b) of the April Monthly Report.

If you have questions or require additional information, please do not hesitate to contact me at (202) 756-8003.

Sincerely,

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